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Associates*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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SECURITIES INVESTOR PROTECTION	:
CORPORATION,	: Adv. Pro. No. 08-01789 (SMB)
	:
Plaintiff-Applicant,	: SIPA LIQUIDATION
v.	:
	: (Substantively Consolidated)
BERNARD L. MADOFF INVESTMENT	:
SECURITIES, LLC,	:
	:
Defendant.	:
-----X	
In re:	:
	:
BERNARD L. MADOFF,	:
	:
Debtor.	:
-----X	
IRVING H. PICARD, Trustee for the Liquidation	:
of Bernard L. Madoff Investment Securities LLC,	:
	: Adv. Pro. No. 10-05371 (BRL)
Plaintiff,	:
v.	:
	:
L.H. RICH COMPANIES, N.R. INVESTMENT	:
ASSOCIATES, and M.R. INVESTMENT	:
ASSOCIATES,	:
	:
Defendants.	:
-----X	

**DECLARATION OF ANDREW J. GOODMAN ESQ. IN OPPOSITION TO THE
TRUSTEE'S MOTION FOR AN ORDER ESTABLISHING OMNIBUS PROCEEDING**

ANDREW J. GOODMAN, under penalty of perjury, declares the following to be true and correct:

1. I am a member of the Bar of this Court and an owner of the firm of Garvey Schubert Barer, counsel of record for defendants L.H. Rich Companies, N.R. Investment Associates, and M.R. Investment Associates ("L.H. Rich Defendants").

2. I submit this declaration concerning documents in opposition to the trustee's Motion for an Order Establishing an Omnibus Proceeding for the Purpose of Determining the Existence, Duration and Scope of the Ponzi Scheme at BLMIS and referenced in the accompanying Memorandum of Law in Opposition to the Trustee's Motion for an Order Establishing Omnibus Proceeding for the Purpose of Determining the Existence, Duration, and Scope of the Ponzi Scheme at BLMIS.

3. Attached as Exhibit A hereto is a true and correct copy of the Complaint filed by the Trustee in this action on or about December 9, 2010.

4. Attached as Exhibit B hereto is a true and correct copy of the L.H Rich Defendants' Motion to Dismiss filed on May 10, 2011.

5. Attached as Exhibit C hereto is a true and correct copy of the Memorandum Decision Regarding Omnibus Motions to Dismiss entered on June 2, 2015.

6. Attached as Exhibit D hereto is a true and correct copy of the July 14, 2015 Stipulation between the Trustee and the L.H. Rich Defendants.

Dated: New York, New York
April 11, 2018

GARVEY SCHUBERT BARER

By: 

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